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## STATE OF COLORADO

Colorado Department of Public Health

and Environment

Roy Romer, Governor Patricia A Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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August 3, 1994

Mr Steven W Slaten
U S Department of Energy
Rocky Flats Office
P O Box 928
Golden, Colorado 80402-0928

RE Pond Water IM/IRA

Dear Mr Slaten,

The purpose of this letter is to clarify the State's position on the administrative control options for pond water management and to outline our expectations for the Final Draft IM/IRA/Decision Document, due to the agencies by October 15 1994

The latest correspondence we have received (94-DOE-07255) presented possible short and long-term administrative control options. Informal comments (dated 7/12/94) on these options were presented to DOE after internal review. The primary point of disagreement is DOE's bias towards a flow through system and the State's insistence that a batch isolation system be maintained in the short-term DOE's position is predicated on the assumption that current pond configuration will not allow containment of all water influent to the system. The agencies have reminded DOE that due to the nature of the facility, the types of unique materials on site, and past operational problems, the risk presented to offsite water recipients is too high to allow a flow through system at this time

That is not to say that some aspect of a continuous flow discharge will not be considered as a long-term alternative. However it is our belief that, despite significant source characterization and control efforts currently underway in several related projects, enough work remains unfinished to render the risk of an undetected or uncontrolled release unacceptable. In general, the lack of influent control and meaningful effluent monitoring is what currently precludes a flow through system across the plantsite.

Until DOE can demonstrate that adequate controls are in place to protect classified uses during continuous discharge, we will require the continued use of isolation and sampling prior to release in the short-term. DOE has failed to justify its self-imposed operational constraints that limit its ability to operate in a batch mode. We would like DOE to revisit the assumptions on maximum volume retention and discharge rates (including dam upgrades) and reassess alternative volume reduction methods presented in the Zero Discharge Study and in the Preliminary Draft IM/IRA as short-term compromises as we both work towards long-term solutions. Meanwhile, the ponds must be capable of fulfilling their role of protecting offsite areas from contaminant releases.

We are formally providing this input to assist in the development of the Final Draft IM/IRA/DD. Neither agency has heard from DOE on this matter since your June correspondence, we feel there is still time to reach consensus on the issues and are willing to continue to meet. We wish to avoid the submittal of a document that has not incorporated our concerns with the preliminary draft and our comments over the last few months. The Decision Document must also go beyond the mandatory discussion of alternatives, it must present proposed actions (and/or combinations of actions), the rationale for their selection, and a schedule for their implementation

Sincerely,

Joe Schieffelin, Unit Leader

Rocky Flats IAG Unit

Hazardous Waste Control Program

cc

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ADMIN RECORD

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